

1271 Avenue of the Americas  
New York, New York 10020-1401  
Tel: +1.212.906.1200 Fax: +1.212.751.4864  
www.lw.com

**LATHAM & WATKINS** LLP

FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Century City	Paris
Chicago	Riyadh
Dubai	San Diego
Düsseldorf	San Francisco
Frankfurt	Seoul
Hamburg	Silicon Valley
Hong Kong	Singapore
Houston	Tel Aviv
London	Tokyo
Los Angeles	Washington, D.C.
Madrid	

May 17, 2024

**VIA ECF**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *SEC v. SolarWinds Corp. et al.*, 1:23-cv-09518-PAE-BCM

Dear Judge Engelmayer:

On behalf of SolarWinds Corp. ("SolarWinds") and Timothy G. Brown (collectively, "Defendants"), we write pursuant to Rule 4.B of the Court's Individual Rules and Practices to respectfully request the Court's permission to file Exhibit A to Defendants' May 17, 2024 Letter to the Court (the "Email Chain") with redactions. Defendants respectfully submit that good cause exists for filing the Email Chain with the proposed redactions.

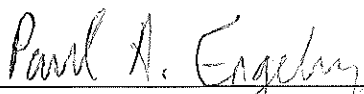
The redacted information is irrelevant to the issues raised in Defendants' letter and consists of forensic information relating to how SolarWinds software maintains security logs, which could pose a security risk if made public. *See Personalized Media Communs., LLC v. Netflix, Inc.*, 2020 U.S. Dist. LEXIS 218085, at \*5-6 (S.D.N.Y. Nov. 19, 2020) (permitting peeling where information could be "used by malicious third parties to attack the [defendant's] service"); *see also Syntel Sterling Best Shores Mauritius Limited v. TriZetto Group.*, 2021 WL 1541385, at \*3 (granting a motion to seal with respect to "confidential and proprietary information regarding [defendant's] . . . information security"). Here, given the sensitive nature of the information—which could be exploited by a future threat actor—redaction is warranted.

Consistent with Section 4.B.2 of the Court's Individual Rules and Practices in Civil Cases, Defendants will contemporaneously file the proposed redacted document under seal via ECF.

Respectfully submitted,

/s/ Serrin Turner  
Serrin Turner  
of LATHAM & WATKINS LLP

GRANTED.  
SO ORDERED.

  
\_\_\_\_\_  
PAUL A. ENGELMAYER  
United States District Judge  
May 21, 2024